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Of Attorneys for Defendants Maytag Corporation and Fedders Corporation

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

DAVID AND MARGE BERG,

Plaintiffs,

v

NORGE CORPORATION, et al.,

Defendants.

Case No. A00-151CV (JWS)

**THIRD STIPULATED MOTION FOR
EXTENSION OF PRETRIAL
DEADLINES**

The parties, having stipulated to this Motion, request an Order of the Court extending the pretrial deadlines set forth in the Court's Order of November 27, 2006, as set forth below. This Motion is supported by the discussion below and the Declaration of Seth H. Row, filed herewith. A proposed form of Order on this Motion is filed contemporaneously with this Motion.

MOTION

The parties request that the pretrial deadlines set out in the Court's Order of November 27, 2006 be extended, as follows:

1. Expert witness disclosure deadline extended from May 15, 2007 for plaintiff to July 16, 2007; and from June 15, 2007 for defendant to August 15, 2007.
2. Final fact witness list deadline extended from April 1, 2007 to June 1, 2007.
3. Discovery for fact witnesses completion deadline extended from June 1, 2007 to August 1, 2007.
4. Discovery from expert witness completion deadline extended from August 23, 2007 to October 23, 2007.
5. Dispositive motions and motions *in limine* deadline extended from September 24, 2007 to November 26, 2007.

DISCUSSION

As set out in the enclosed Declaration of Seth H. Row, the parties request the extensions described above because the parties have been engaged in extensive settlement negotiations, and have now agreed to mediation of this matter before retired Alaska Supreme Court Justice Moore on April 16, 2007, in Portland, Oregon, and desire to limit the costs incurred prior to that mediation.

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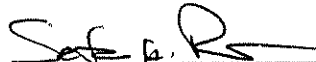
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The parties request that the Court grant this Motion without a scheduling conference.


DATED this 2nd day of April, 2007.

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STIPULATED TO BY:


Seth H. Row (admitted pro hac vice)
Of Attorneys for Defendants Maytag
Corporation and Fedders Corporation

agreed to telephonically on April 2, 2007
Michael W. Flanigan
Of Attorneys for Plaintiffs

CERTIFICATE OF SERVICE


I hereby certify that I served the foregoing **THIRD STIPULATED MOTION FOR EXTENSION OF PRETRIAL DEADLINES** on the following person:

Michael W. Flanigan
Walther & Flanigan
1029 W. 3rd Avenue, Suite 250
Anchorage, AK 99501

by the following indicated method or methods:

- ☒ by mailing full, true and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the parties and/or their attorneys as shown above, the last-known office addresses of the parties and/or attorneys, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- ☐ by causing full, true, and correct copies thereof to be hand-delivered to the parties and/or their attorneys at their last-known office addresses listed above on the date set forth below.
- ☐ by sending full, true, and correct copies thereof, via overnight courier in sealed, prepaid envelopes, addressed to the parties and/or their attorneys as shown above, the last-known office addresses of the attorneys, on the date set forth below.
- ☒ by causing full, true, and correct copies thereof to be delivered via electronic mail to the parties and/or their attorneys at their last-known e-mail addresses listed above on the date set forth below.
- ☐ by faxing full, true, and correct copies thereof to the fax machines which are the last-known fax numbers for the parties' and/or attorneys' offices, on the date set forth below.

DATED this 2nd day of April, 2007.



Christopher W. Angius
Seth H. Row

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